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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 TONIQUEWA BALLARD,
16 Defendant.
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Case No. 2:15-cr-195-GMN-CWH

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
19 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for
20 the United States of America, and Heidi A. Ojeda, Assistant Federal Public Defender,
21 counsel for Toniquewa Ballard, that the employment condition of Ms. Ballard's pre-trial
22 release be modified to allow her the option of participating in educational programs in lieu
23 of seeking employment.

24 This Stipulation is entered into for the following reasons:

25 1. On August 3, 2015, the Court released Ms. Ballard on a personal
26 recognizance bond. (*See Minutes of Proceedings (#20).*) Among the conditions imposed,

1 the Court ordered that the Defendant shall maintain or seek employment. (*See* PR Bond
2 at 3 -4 (#21).)

3 2. On August 25, 2015, Ms. Ballard's Pretrial Services officer contacted
4 undersigned counsel, alerting undersigned counsel that Ms. Ballard has not yet obtained
5 her general equivalency diploma (GED). Pretrial Services suggested that the parties
6 request that Ms. Ballard's employment condition be modified to include the clause "and/or
7 participate in an educational program." Modification of this condition to include the above
8 language will allow Ms. Ballard to obtain her GED and pursue other educational
9 programs with the time that she would otherwise be required to devote to finding
10 employment.

11 3. The parties and Pretrial Services believe that allowing Ms. Ballard to obtain
12 her GED and further her education in lieu of seeking employment will assist Ms. Ballard
13 with finding employment at a future date as most companies require a GED.

14 DATED this 26th day of August, 2015

15 RENE L. VALLADARES
16 Federal Public Defender

DANIEL G. BOGDEN
United States of America

17 */s/ Heidi A. Ojeda*
18 By: _____
HEIDI A. OJEDA
Assistant Federal Public Defender

/s/ Robert Knief
By: _____
ROBERT KNIEF
Assistant United States Attorney

1
2 UNITED STATES DISTRICT COURT
3 DISTRICT OF NEVADA

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 TONIQUEWA BALLARD,

8 Defendant.
9

Case No. 2:15-cr-195-GMN-CWH

ORDER

10 **ORDER**

11 **IT IS THEREFORE ORDERED**, that Ms. Ballard's employment condition shall be
12 modified to the following: The defendant shall maintain or actively seek lawful and
13 verifiable employment and/or participate in an educational program, and shall notify
14 Pretrial Services or the supervising officer prior to any change.

15 DATED: August 27, 2015

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19 UNITED STATES MAGISTRATE JUDGE
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